

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

**In Re:** :  
**MAURICE NESMITH,** : **Bankruptcy No. 19-10001-amc**  
**Debtor** : **Chapter 13**  
**Freedom Mortgage Corporation** :  
**Movant** :  
 :  
 :  
**v.** :  
**MAURICE NESMITH** : **11 U.S.C. §362**  
  
**and**  
**Scott F. Waterman, ESQUIRE (TRUSTEE)**

**Respondent(s)** :

**CERTIFICATION OF NO ANSWER REGARDING FREEDOM MORTGAGE CORPORATION'S  
MOTION FOR RELIEF FROM STAY (DE 46)**

The undersigned hereby certifies that, as of August 17, 2022, the undersigned has received no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay.

The undersigned further certifies that I have reviewed the Court's docket in this case and no answer, objection or other responsive pleading to the Movant's Motion for Relief from Stay. Pursuant to the Notice of Motion, objections to the Movant's Motion were to be filed and served before July 26, 2022.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: August 18, 2022

Respectfully submitted,

Brock & Scott, PLLC

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Certification of No Answer has been electronically served or mailed, postage prepaid on August 19, 2022 to the following:

MAURICE NESMITH  
5628 BELMAR TER  
PHILADELPHIA, PA 19143-4713

Henry Alan Jefferson, Debtor's Attorney  
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Scott F. Waterman, Bankruptcy Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Ave, Suite 100  
Reading, PA 19606  
ECFMail@ReadingCh13.com

United States Trustee, US Trustee  
Office of the U.S. Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, PA 19106

/s/ Mario Hanyon  
Andrew Spivack, PA Bar No. 84439  
Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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